



United States Attorney
Southern District of New York

The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007

January 25, 2016

BY ECF AND E-MAIL

The Honorable Andrew L. Carter, Jr.
United States District Judge
Southern District of New York
40 Foley Square, Room 435
New York, New York 10007

Re: United States v. Edward Durante et al.,
S4 15 Cr. 171 (ALC)

Dear Judge Carter:

The Government respectfully submits a revised proposed protective order for the Court's consideration and signing. The Government is prepared to produce the vast majority of discovery in this case, but we cannot do so until the protective order is entered by the Court. To date, counsel for defendants Christopher Cervino, Larry Werbel, and Sheik F. Khan have consented to the entry of the protective order.

As the Court is aware, defendant Edward Durante still does not have counsel of record in this case, which is subject to a further conference on January 29, 2016. Accordingly, Durante does not yet have counsel who can review (and consent) to the proposed protective order. Yet in order to facilitate the production of discovery to the remaining three defendants,

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the Government respectfully submits the proposed order for the Court's consideration. After it is entered, the Government will produce discovery forthwith.

Respectfully submitted,

PREET BHARARA
United States Attorney

By: /s/
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Cc: Jennifer Willis, Esq., (presentment counsel for Edward Durante)
Anthony Capozzolo, Esq./David Greenfield, Esq. (counsel to Christopher Cervino)
Richard Blake, Esq., (counsel to Larry Werbel)
Joanna Hendon, Esq., (counsel to Sheik F. Khan)